

NIMA GHAZVINI  
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**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF HAWAII  
1132 Bishop Street, Suite 250  
Honolulu, Hawaii 96813**

Chapter 13 Case No. 22-00571  
Plan – Docket No. 2

Debtor(s):  
DAWSON E NENA

**TRUSTEE'S OBJECTION TO CHAPTER 13 PLAN**

Trustee objects to confirmation of the proposed plan because:

-The funding of the plan is speculative and fails to meet the requirements of 11 USC § 1326 (a)(1)(A) – Debtor(s) commenced this case on August 12, 2022 and currently propose to repay creditors at \$435.00 for 60 months. To date, the total amount due into the plan is \$870.00 and the total amount paid is \$435.00 – the current delinquent amount is \$435.00, through October 18, 2022.

-Failure to provide full payment of all secured, priority, and special unsecured claims:

- Internal Revenue Service filed secured claim #5 for higher (\$10,361.20) than scheduled (\$100.00).
- Honolulu FCU filed secured claim #8 for higher (\$23,959.90) than scheduled (\$15,487.00).

The plan currently proposes a base amount of \$26,100.00. The amount needed to pay claims as filed, other listed governmental claims, related interest charges, and the cost of administration is estimated at \$38,524.38.

**CERTIFICATE OF SERVICE**

Trustee also certifies that a copy of this objection was served on the Office of the United States Trustee and the persons below by the court's electronic transmission facilities (ECF) or first-class mail.

Dated: 10/18/2022

/s/ Veronica Valdez

Attorney for Debtor(s):  
ABELMANN PETERSON LLLC  
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VIA CM/ECF

Debtor(s):  
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